

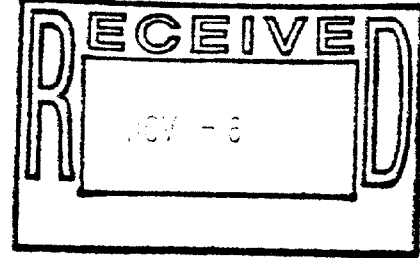


Whole Food Supplements

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October 27, 2000



The Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C. Street S.W.
Washington, DC 20204

Dear Sir/Madam:

This is a notification pursuant to 21 U.S.C. 343(r)(6) that Standard Process Inc., Palmyra, Wisconsin 53156-0904, is making the following statements:

- (1) Betacol, a member of the liver, gall bladder, and digestive family of products, enhances the cleansing function of these systems and supports their roles in the delicate balance between acid and alkaline maintenance.
- (2) Preserving this delicate balance at the cellular level helps maintain healthy joints.
- (3) Betacol contains Tillandsia to help maintain general well-being.

These statements are made for a dietary supplement containing a proprietary blend of *Tillandsia usneoides*, soy (bean), bovine liver PMG™ extract, betaine hydrochloride, calcium lactate, defatted wheat (germ), potassium bicarbonate, choline bitartrate, inositol, disodium phosphate, bovine adrenal Cytosol™ extract, oat flour, and ascorbic acid. Other ingredients include gelatin, water, niacinamide, pyridoxal 5-phosphate, natural colors, and calcium stearate. The name of the product is Betacol®.

The information contained herein is accurate and Standard Process Inc. has substantiation that the statements are truthful and not misleading.

Sincerely yours,

Ann Holden
Standard Process Inc.

995-0162



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